INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

December 30, 2003

TO: Interested Parties / Applicant

RE: Matthew-Warren Incorporated / F017-16766-00022

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 9/16/03

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

Matthew-Warren Incorporated
Plants #1 and #3 - 500 E. Ottawa St., Logansport, IN 46974
Plant #2 - 300 E. Miami Ave., Logansport, IN 46974
Plant #5 - 801 Bates Street, Logansport, IN 46947

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F017-16766-00022	
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 30, 2003 Expiration Date: December 30, 2008

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

D.3.2 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1, A.3, and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary steel springs manufacturing source.

Authorized Individual:	Vice President General Manager
Source Address:	Plants #1 and #3 - 500 E. Ottawa St., Logansport, IN 46974 Plant #2 - 300 E. Miami Ave., Logansport, IN 46974 Plant #5 - 801 Bates Street, Logansport, IN 46947
Mailing Address:	P. O. Box 7008, Logansport, IN 46974
SIC Code:	3495
Source Location Status:	Cass
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]

This steel springs manufacturing company consists of four (4) plants:

(1) Plant #1 is located at 500 E. Ottawa St., Logansport, IN 46947;

(2) Plant 2 is located at 300 E. Miami Ave., Logansport, IN 46947;

(3) Plant #3 is located at 500 E. Ottawa St., Logansport, IN 46947; and

(4) Plant #5 is located at 801 Bates Street, Logansport, IN 46947.

Since the four (4) plants are located on contiguous or adjacent properties, belong to the same industrial grouping , and under common control of the same entity, they will be considered one (1) source as determined in the original FESOP permit (No. 017-7074-00022), issued on November 4, 1998.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source source consists of the following emission units and pollution control devices:

Plant #1:

(a) One (1) segment, identified as SCP101, for applying paints and inks to steel springs and miscellaneous metal parts through dipping, brushing and rollcoating, and exhausting through three (3) stacks (ID #'s S101A, S101C and S101D);

(b) One (1) segment, identified as SCP102, for marking steel springs with a rollcoater or stamper, and exhausting through two (2) stacks (ID #'s S102A and S102B);

(c) One (1) segment, identified as SCP103, for applying paints and inks to steel springs and miscellaneous metal parts through dipping, brushing and rollcoating, and exhausting through two (2) stacks (ID #'s S103A and S103B);

(d) One (1) operation identified as grinding tooling department consisting of one (1) small hand grinder controlled by one (1) baghouse identified as 125x030 (GP101).

(e) One (1) operation identified as Department 122 consisting of:
(1) Two (2) grinders identified as 125F21 and 125F77, each controlled by a dust collector identified as 125x030 (GP101).
(2) One (1) shot peen unit controlled by a dust collector identified as 533x005 (GP103).

(f) One (1) operation identified as Department 125 consisting of:
(1) Sixteen (16) grinders, with two (2) of the grinders controlled by a dust collector identified as 125x030 (GP101); with four (4) of the grinders controlled by a dust collector identified as 125x031 (GP102); and ten of the grinders controlled by a dust collector identified as 125x032 (GP104).
(2) Two hand grinders

(g) One (1) operation identified as Department 122 consisting of:
(1) One (1) shot peen unit controlled by a dust collector identified as 533x005 (GP103).
(2) Two (2) grinders identified as 125F21 and 125F77, each controlled by a dust collector identified as 125x030 (GP101).

(h) One (1) operation identified as Department 119 (segment 1) consisting of a shot peen unit identified as 123H004 (GP105) controlled by the dust collector and exhausting inside the building.

(i) One (1) operation identified as shot peening department consisting of four (4) shot peens, each using steel shot and controlled by one (1) baghouse identified as 533x005 (GP103).

(j) One (1) operation identified as Department 123 (medium coiling) consisting of one (1) grinder controlled by a dust collector 125x032 (GP104).

(k) One (1) operation identified as Department 127 consisting of the following:
(1) One (1) shot peen unit identified as 127H001 controlled by a dust collector 533x005 (GP103).
(2) Three (3) grinders and one (1) chamfer, each controlled by a dust collector 125x032 (GP104).

Plant #2:

(a) One (1) segment, identified as SCP201, for applying water based paints by dipping steel springs in a dip tank and then putting onto a conveyorized rack for drying;

(b) One (1) operation identified as hot coil department consisting of the following:
(1) One (1) shot peen unit identified as 533H011 and controlled by a dust collector 230x024 (GP202).
(2) One (1) shot peen unit identified as 30H12 controlled by a dust collector 230x024 (GP202), and two (2) spring presses.
(3) Two (2) hand grinders controlled by a dust collector identified as 233x023 (GP201).

(4) Two (2) abrasive saws controlled by drum dust collector.

Plant #3:

There are no activities qualified as significant at the plant.

Plant #5:

There are no activities qualified as significant at the plant.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) One (1) segment in Plant #3, identified as SCP301, where steel T-bar ends are dipped into a small dip tank for identification coating and then put onto a rack to air dry.

(b) Natural gas-fired combustion sources with heat input equal or less than ten (10) mmBtu/hr.
(1) Two (2) natural gas fired ovens (135L003 and 135L009) located under the Stress relieve and heatset department at plant 1, each rated at 0.53 and 1.0 MMBtu/hr, respectively.
(2) One (1) natural gas-fired oven (135L008) located under Department 135 at plant 1, rated at 0.18 MMBtu/hr.
(3) Three (3) natural gas fired ovens (135L007, 135L005 and 135L001) located under Department 123 at plant 1, each rated at 0.5, 0.8 and 0.53 MMBtu/hr.
(4) Two (2) natural gas fired furnaces (K30 and L20) located under the Heat treat department at plant 2, each rated at 4.2 and 1.2 MMBtu/hr.
(5) Three (3) natural gas fired furnaces located under the Heat treat department at plant 2, each rated at 1.0 MMBtu/hr.
(6) Three (3) natural gas fired bar furnaces (J17, J16, J11) located under the Hot coil department at plant 2, each rated at 2.0, 1.5 and 4.10 MMBtu/hr.
(7) Three (3) natural gas fired draw furnaces located under the Hot coil department, each rated at 2.0, 1.0, and 0.8 MMBtu/hr.
(8) One (1) natural gas fired stress relief oven rated at 0.8 MMBtu/hr and one (1) natural gas fired annealing furnace rated at 0.2 MMBtu/hr, both located at plant 3.
(9) Two (2) natural gas fired furnaces, each rated at 1.2 MMBtu/hr and located at plant 5.

(c) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(e) Filling drums, pails or other packaging containers with lubricating oils, waxes and greases.

(f) Application of oils, lubricans or other nonvolatile materials applied as temporary protective coatings.

(g) Machining where an aqueous cutting coolant continuously floods the machining interface.

(h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, solding equipment, and welding equipment. [326 IAC 6-3-2]

(i) Groundwater oil recovery wells.

(j) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(k) Quenching operations used with heat treating processes.

(l) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(m) Process vessel degassing and cleaning to prepare for internal repairs.

(n) Paved and unpaved roads and parking lots with public access.

(o) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(p) Blowdown for any of the following: sight glass, boiler, compressors, pump and cooling tower.

(q) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 cubic feet per minute, including the following; deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]

(1) One (1) belt sander, one (1) feeder, two (2) multislides, one (1) small grinder controlled by a dust collector with air flow rate of 900 acfm and venting inside the building (plant #3). [326 IAC 6-3-2]

(2) Tool and dye shop consisting of drill presses, cutting saws, lathes, mill, one (1) blanchard wet grinder (340F027), one (1) wet surface grinder, two surface grinders, one (a) cutoff saw, one (1) dust collector controlling particulate emissions from the five (5) grinders and one (1) bead blast unit (340H002) with an air flow rate of 900 acfm (plant #3). [326 IAC 6-3-2]

(3) Two (2) shot peen units identified as 550H01 and 550H02, each controlled by one (1) dust collector identified as 550x01 and 550x02, and with the air flow rate of 765 and 935 acfm, respectively (plant #5). [326 IAC 6-3-2]

(4) One (1) wet grinder identified as 125F041 controlled by a dust collector with the flow rate of 100 acfm and exhausting indoors (plant 1 first floor). [326 IAC 6-3-2]

(5) Two (2) grinders identified as 122F11 and 122F04, each controlled by a dust collector with the flow rate of 100 acfm, identified as 122x01 (Department 22). [326 IAC 6-3-2]

(6) One (1) shot peen unit identified as 230H001 and controlled by a dust collector (230x002) with air flow rate of 900 acfm (plant 2 hot coil department). [326 IAC 6-3-2]

(r) Miscellaneous use of VOC containing materials for cleaning, partswashing, quality assurance tests, and rust inhibiting the finished product consuming less than 3 pounds per hour or 15 pounds per day of VOC.
Application of water soluble anti-rust solution identified as WS-72.

(s) The maintenance activities for electric equipment which consumes greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs.

(t) Activities with emissions below insignificant thresholds not previously identified (i.e. VOC emission less than 3 lb/hr and particulate emission less than 5 lb/hr):
Plant 1 (First Floor)
(1) One (1) ink application operation through stamp pad.
(2) One (1) operation identified as mill wright department consisting of one (1) degreaser [326 IAC 8-3-2].
Plant 1 (Basement)
(3) One (1) parts degreasing operation for department 127 [326 IAC 8-3-2].
(4) One (1) parts degreasing operation for department 135 [326 IAC 8-3-2].
(5) One (1) paint operation using dip coating application method.
(6) Two (2) oiling stations.
Plant #2
(7) One (1) maintenance department parts degreasing operation.
Plant #3
(8) One (1) parts degreasing operation [326 IAC 8-3-2].
(9) One (1) GM torque rod line consisting of the following:
(i) One (1) nylon spraying operation controlled by cartridge filter capturing particulates. [326 IAC 6-3-2]
(ii) One (1) paint application operation (F78WX) using dipping application method.

A.5 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.6 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM , the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, . IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the

attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ , may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ , by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent

injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as

expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ , any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to

public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ , in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The

application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-2 (PSD);

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326

IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance as defined in is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and

prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee,

the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Plant #1:

(a) One (1) segment, identified as SCP101, for applying paints and inks to steel springs and miscellaneous metal parts through dipping, brushing and rollcoating, and exhausting through three (3) stacks (ID #'s S101A, S101C and S101D).

(b) One (1) segment, identified as SCP102, for marking steel springs with a rollcoater or stamper, and exhausting through two (2) stacks (ID #'s S102A and S102B).

(c) One (1) segment, identified as SCP103, for applying paints and inks to steel springs and miscellaneous metal parts through dipping, brushing and rollcoating, and exhausting through two (2) stacks (ID #'s S103A and S103B).

Plant #2:

(a) One (1) segment, identified as SCP201, for applying water based paints by dipping steel springs in a dip tank and then putting onto a conveyorized rack for drying.

Insignificant Activity

Plant #3:

(a) One (1) segment in Plant #3, identified as SCP301, where steel T-bar ends are dipped into a small dip tank for identification coating and then put onto a rack to air dry.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

The Permittee shall comply with the following:

(a) The total input usage of any single hazardous air pollutant (HAP) delivered to the applicators in the surface coating operations (identified as SCP101, SCP102, SCP103, SCP201, and SCP301), including HAP usage for clean-up, shall be less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition shall limit the source-wide potential to emit a single HAP to less than 10 tons per twelve (12) consecutive month period.

(b) The total input usage of the combined HAPs delivered to the applicators in the surface coating operations (identified as SCP101, SCP102, SCP103, SCP201, and SCP301), including combined HAP usage for clean-up, shall be less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition shall limit the source-wide potential to emit total HAPs to less than 25 tons per twelve (12) consecutive month period.

Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the HAP content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

There are no compliance monitoring requirements.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.4 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The HAP content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on daily monthly basis.

(1) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The volume weighted HAP content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total HAP usage for each month; and

(6) The weight of HAPs emitted for each compliance period.

(b) To document compliance with Condition D.1.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Plant #1:

(d) One (1) operation identified as grinding tooling department consisting of one (1) small hand grinder controlled by one (1) baghouse identified as 125x030 (GP101).

(e) One (1) operation identified as Department 122 consisting of:
(1) Two (2) grinders identified as 125F21 and 125F77, each controlled by a dust collector identified as 125x030 (GP101).
(2) One (1) shot peen unit controlled by a dust collector identified as 533x005 (GP103).

(f) One (1) operation identified as Department 125 consisting of:
(1) Sixteen (16) grinders, with two (2) of the grinders controlled by a dust collector identified as 125x030 (GP101); with four (4) of the grinders controlled by a dust collector identified as 125x031 (GP102); and ten of the grinders controlled by a dust collector identified as 125x032 (GP104).
(2) Two hand grinders

(g) One (1) operation identified as Department 122 consisting of:
(1) One (1) shot peen unit controlled by a dust collector identified as 533x005 (GP103).
(2) Two (2) grinders identified as 125F21 and 125F77, each controlled by a dust collector identified as 125x030 (GP101).

(h) One (1) operation identified as Department 119 (segment 1) consisting of a shot peen unit identified as 123H004 (GP105) controlled by the dust collector and exhausting inside the building.

(i) One (1) operation identified as shot peening department consisting of four (4) shot peens, each using steel shot and controlled by one (1) baghouse identified as 533x005 (GP103).

(j) One (1) operation identified as Department 123 (medium coiling) consisting of one (1) grinder controlled by a dust collector 125x032 (GP104).

(k) One (1) operation identified as Department 127 consisting of the following:
(1) One (1) shot peen unit identified as 127H001 controlled by a dust collector 533x005 (GP103).
(2) Three (3) grinders and one (1) chamfer, each controlled by a dust collector 125x032 (GP104).

Plant #2:

(b) One (1) operation identified as hot coil department consisting of the following:
(1) One (1) shot peen unit identified as 533H011 and controlled by a dust collector 230x024 (GP202).
(2) One (1) shot peen unit identified as 30H12 controlled by a dust collector 230x024 (GP202), and two (2) spring presses.
(3) Two (2) hand grinders controlled by a dust collector identified as 233x023 (GP201).
(4) Two (2) abrasive saws controlled by drum dust collector.

(The information describing the process contained in this facility description box is descriptive

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter less than 10 Microns (PM-10) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, PM-10 emissions from the following facilities shall be limited as follows:

Facilities	Limited PM10 Emissions (lb/hr)	Limited PM10 Emissions (tons/yr)
GP 101	0.66	2.89
GP 102	0.66	2.89
GP 103	0.66	2.89
GP 104	3.03	13.28
GP 105	0.13	0.58
GP 201	1.05	4.62
GP 202	0.13	0.58

Compliance with this condition shall limit the source-wide potential to emit PM-10 to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70) shall not apply.

D.2.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the following operations shall be limited as follows:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

Facilities	Process Weight Rate (tons/hr)	PM Allowable Emissions (lb/hr)
GP 101	0.273	1.72
GP 102	0.273	1.72
GP 103	0.273	1.72
GP 104	1.255	4.77
GP 105	0.054	0.58
GP 201	0.436	2.35
GP 202	0.054	0.58

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the shot blasters and their control devices.

Compliance Determination Requirements

D.2.4 Particulate Control

In order to comply with D.2.1, and D.2.2, the baghouses for particulate control shall be in operation and control emissions from the grinding and shot peen operations (GP 101, GP 102, GP 103, GP 104, GP 105, GP 201, and GP 202), at all times that the units are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.5 Visible Emissions Notations

(a) Visible emission notations of the grinding and shot peen operations (GP 101, GP 102, GP 103, GP 104, GP 105, GP 201, and GP 202) stacks exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses controlling the grinding and shot peen operations (GP 101, GP 102, GP 103, GP 104, GP 105, GP 201, and GP 202), at least once per shift when the units are in operation. When for any one reading, the pressure drop across the baghouses 125X30, 125X31, 533X05, 125X32, 123H04, 230X23, and 230X24 is outside the normal ranges of 1.0 and 1.5, 1.2 and 1.7, 0.8 and 1.3, 1.8 and 2.6, 2.5 and 4, 0.6 and 1.1, and 0.8 and 1.3 inches of water, respectively or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan-Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the grinding and shot peen operations (GP 101, GP 102, GP 103, GP 104, GP 105, GP 201, and GP 202). Inspections

required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.9 Record Keeping Requirements

(a) To document compliance with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the grinding and shot peen operations (GP 101, GP 102, GP 103, GP 104, GP 105, GP 201, and GP 202) stacks exhaust once per shift.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain records once per shift of the total static pressure drop.

(c) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7.

(d) To document compliance with Condition D.2.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Insignificant Activities

(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, solding equipment, and welding equipment. [326 IAC 6-3-2]

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 cubic feet per minute, including the following; deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]

(1) One (1) belt sander, one (1) feeder, two (2) multislides, one (1) small grinder controlled by a dust collector with air flow rate of 900 acfm and venting inside the building (plant #3). [326 IAC 6-3-2]

(2) Tool and dye shop consisting of drill presses, cutting saws, lathes, mill, one (1) blanchard wet grinder (340F027), one (1) wet surface grinder, two surface grinders, one (a) cutoff saw, one (1) dust collector controlling particulate emissions from the five (5) grinders and one (1) bead blast unit (340H002) with an air flow rate of 900 acfm (plant #3). [326 IAC 6-3-2]

(3) Two (2) shot peen units identified as 550H01 and 550H02, each controlled by one (1) dust collector identified as 550x01 and 550x02, and with the air flow rate of 765 and 935 acfm, respectively (plant #5). [326 IAC 6-3-2]

(4) One (1) wet grinder identified as 125F041 controlled by a dust collector with the flow rate of 100 acfm and exhausting indoors (plant 1 first floor). [326 IAC 6-3-2]

(5) Two (2) grinders identified as 122F11 and 122F04, each controlled by a dust collector with the flow rate of 100 acfm, identified as 122x01 (Department 22). [326 IAC 6-3-2]

(6) One (1) shot peen unit identified as 230H001 and controlled by a dust collector (230x002) with air flow rate of 900 acfm (plant 2 hot coil department). [326 IAC 6-3-2]

(c) Activities with emissions below insignificant thresholds not previously identified (i.e. VOC emission less than 3 lb/hr and particulate emission less than 5 lb/hr):

Plant 1 (First Floor)

(1) One (1) ink application operation through stamp pad.

(2) One (1) operation identified as mill wright department consisting of one (1) degreaser [326 IAC 8-3-2].

Plant 1 (Basement)

(3) One (1) parts degreasing operation for department 127 [326 IAC 8-3-2].

(4) One (1) parts degreasing operation for department 135 [326 IAC 8-3-2].

(5) One (1) paint operation using dip coating application method.

(6) Two (2) oiling stations.

Plant #2

(7) One (1) maintenance department parts degreasing operation.

Plant #3

(8) One (1) parts degreasing operation [326 IAC 8-3-2].

(9) One (1) GM torque rod line consisting of the following:

(i) One (1) nylon spraying operation controlled by cartridge filter capturing particulates. [326 IAC 6-3-2]

(ii) One (1) paint application operation (F78WX) using dipping application method. application method.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.2 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Matthew-Warren Incorporated
Source Address: 500 E. Ottawa Street, Logansport, Indiana 46974
Mailing Address: P. O. Box 7008, Logansport, Indiana 46974
FESOP No.: F017-16766-00022

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

? Annual Compliance Certification Letter

? Test Result (specify) _____

? Report (specify) _____

? Notification (specify) _____

? Affidavit (specify) _____

? Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Matthew-Warren Incorporated
Source Address: 500 E. Ottawa Street, Logansport, Indiana 46974
Mailing Address: P. O. Box 7008, Logansport, Indiana 46974
FESOP No.: F017-16766-00022

This form consists of 2 pages **Page 1 of 2**

? This is an emergency as defined in 326 IAC 2-7-1(12)
?The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
?The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Matthew-Warren Incorporated
Source Address: 500 E. Ottawa Street, Logansport, Indiana 46974
Mailing Address: P. O. Box 7008, Logansport, Indiana 46974
FESOP No.: F017-16766-00022
Facility: surface coating operations (identified as SCP101, SCP102, SCP103, SCP201, and SCP301)
Parameter: Single and Combined Hazardous Air Pollutants (HAPs)
Limit: The total input usage of any single HAP, and total HAPs delivered to the applicators in the surface coating operations (identified as SCP101, SCP102, SCP103, SCP201, and SCP301) and during clean-up shall be limited to less than 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

YEAR: _____

Month	Total Usage This Month (tons)		Total Usage Previous 11 Months (tons)		Total Usage 12 Months (tons)	
	Single HAP	Combined HAPs	Single HAP	Combined HAPs	Single HAP	Combined HAPs
Month 1						
Month 2						
Month 3						

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Matthew-Warren Incorporated
Source Address: 500 E. Ottawa Street, Logansport, Indiana 46974
Mailing Address: P. O. Box 7008, Logansport, Indiana 46974
FESOP No.: F017-16766-00022

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

? NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

? THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	

Probable Cause of Deviation:
Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ______________________________

Title/Position: ______________________________

Date: ______________________________

Phone: ______________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Name:	Matthew - Warren Incorporated
Source Location:	Plants #1 and #3 - 500 E. Ottawa St., Logansport, IN 46947 Plant #2 - 300 E. Miami Ave., Logansport, IN 46947 Plant #5 - 801 Bates Street, Logansport, IN 46947
County:	Cass
SIC Code:	3495
Operation Permit No.:	F017-16766-00022
Permit Reviewer:	Adeel Yousuf / EVP

On August 8, 2003, the Office of Air Quality (OAQ) had a notice published in the Pharos Tribune in Logansport, Indiana, stating that Matthew - Warren Incorporated had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal relating to the operation of a steel springs manufacturing source. The notice also stated that OAQ proposed to issue a FESOP Renewal for this operation and provided information on how the public could review the proposed FESOP Renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP Renewal should be issued as proposed.

Upon further review, the OAQ has decided to revise the emission unit description in the FESOP renewal based on the updated information submitted by the source. This update provides greater details in equipment description. Bolded language has been added and the language with a line through it has been deleted.

1. Sections A.1, A.2, A.3 and A.4 have been updated to incorporate the new emission units and correct information.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary steel springs manufacturing source.

Authorized Individual:	Vice President General Manager
Source Address:	Plants #1 and #3 - 500 E. Ottawa St., Logansport, IN 469~~7~~4**7** Plant #2 - 300 E. Miami Ave., Logansport, IN 469~~7~~4**7** **Plant #5 - 801 Bates Street, Logansport, IN 46947**
Mailing Address:	P. O. Box 7008, Logansport, IN 469~~7~~4**7**
SIC Code:	3495
Source Location Status:	Cass
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]

This steel springs manufacturing company consists of ~~three (3)~~ **four (4)** plants:

(1) Plant #1 is located at 500 E. Ottawa St., Logansport, IN 46947;

(2) Plant 2 is located at 300 E. Miami Ave., Logansport, IN 46947; ~~and~~

(3) Plant #3 is located at 500 E. Ottawa St., Logansport, IN 46947~~.~~**; and**

(4) Plant #5 is located at 801 Bates Street, Logansport, IN 46947.

Since the ~~three~~ **four** (~~3~~**4**) plants are located on contiguous or adjacent properties, belong to the same industrial grouping , and under common control of the same entity, they will be considered one (1) source as determined in the original FESOP permit (No. 017-7074-00022), issued on November 4, 1998.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source ~~source~~ consists of the following emission units and pollution control devices:

Plant #1:

(a) One (1) segment, identified as SCP101, for applying paints and inks to steel springs and miscellaneous metal parts through dipping, brushing and rollcoating, and exhausting through three (3) stacks (ID #'s S101A, S101C and S101D);

(b) One (1) segment, identified as SCP102, for marking steel springs with a rollcoater or stamper, and exhausting through two (2) stacks (ID #'s S102A and S102B);

(c) One (1) segment, identified as SCP103, for applying paints and inks to steel springs and miscellaneous metal parts through dipping, brushing and rollcoating, and exhausting through two (2) stacks (ID #'s S103A and S103B);

~~(d) One (1) segment, identified as GP 101, which includes unit ID #'s G19, G18, G20, G01 and P01, for grinding and shot peen of steel springs, with all units controlled by one (1) baghouse, identified as 125X30;~~

~~(e) One (1) segment, identified as GP 102, which includes unit ID #'s G02, G03, G04, G05 and G06, for shot peen of steel springs and grinding the ends, with all units controlled by one (1) baghouse, identified as 125X31;~~

~~(f) One (1) segment, identified as GP 103, which includes unit ID #'s P02, P03, P04, P05 and P10, for grinding and shot peen of steel springs, with all units controlled by one (1) baghouse, identified as 533X05;~~

~~(g) One (1) segment, identified as GP 104, which includes unit ID #'s G07 - G17, G22 - G31, G35 and G36, for grinding and shot peen of steel springs, with all units controlled by one (1) baghouse, identified as 125X32; and~~

~~(h) One (1) segment, identified as GP 105 which includes unit ID # P06, for grinding and shot peen of steel springs, controlled by one (1) baghouse, identified as 123H04.~~

(d) One (1) operation identified as grinding tooling department consisting of one (1) small hand grinder controlled by one (1) baghouse identified as 125x030 (GP101).

(e) One (1) operation identified as Department 122 consisting of:
(1) Two (2) grinders identified as 125F21 and 125F77, each controlled by a dust collector identified as 125x030 (GP101).
(2) One (1) shot peen unit controlled by a dust collector identified as 533x005 (GP103).

(f) One (1) operation identified as Department 125 consisting of:
(1) Sixteen (16) grinders, with two (2) of the grinders controlled by a dust collector identified as 125x030 (GP101); with four (4) of the grinders controlled by a dust collector identified as 125x031 (GP102); and ten of the grinders controlled by a dust collector identified as 125x032 (GP104).
(2) Two hand grinders

(g) One (1) operation identified as Department 122 consisting of:
(1) One (1) shot peen unit controlled by a dust collector identified as 533x005 (GP103).
(2) Two (2) grinders identified as 125F21 and 125F77, each controlled by a dust collector identified as 125x030 (GP101).

(h) One (1) operation identified as Department 119 (segment 1) consisting of a shot peen unit identified as 123H004 (GP105) controlled by the dust collector and exhausting inside the building.

(i) One (1) operation identified as shot peening department consisting of four (4) shot peens, each using steel shot and controlled by one (1) baghouse identified as 533x005 (GP103).

(j) One (1) operation identified as Department 123 (medium coiling) consisting of one (1) grinder controlled by a dust collector 125x032 (GP104).

(k) One (1) operation identified as Department 127 consisting of the following:
(1) One (1) shot peen unit identified as 127H001 controlled by a dust collector 533x005 (GP103).
(2) Three (3) grinders and one (1) chamfer, each controlled by a dust collector 125x032 (GP104).

Plant #2:

(a) One (1) segment, identified as SCP201, for applying water based paints by dipping steel springs in a dip tank and then putting onto a conveyorized rack for drying;

~~(b) One (1) segment, identified as GP 201, which includes unit ID #'s G32 - G34, P07 - P08, and R01 - R03 and G36, for grinding and shot peen of steel springs, with all units~~

~~controlled by one (1) baghouse, identified as 230X23; and~~

~~(c) One (1) segment, identified as GP 202, which includes unit ID # P09, for grinding and shot peen of steel springs, controlled by one (1) baghouse, identified as 230X24.~~

(b) One (1) operation identified as hot coil department consisting of the following:

(1) One (1) shot peen unit identified as 533H011 and controlled by a dust collector 230x024 (GP202).

(2) One (1) shot peen unit identified as 30H12 controlled by a dust collector 230x024 (GP202), and two (2) spring presses.

(3) Two (2) hand grinders controlled by a dust collector identified as 233x023 (GP201).

(4) Two (2) abrasive saws controlled by drum dust collector.

Plant #3:

There are no activities qualified as significant at the plant.

Plant #5:

There are no activities qualified as significant at the plant.

A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) One (1) segment in Plant #3, identified as SCP301, where steel T-bar ends are dipped into a small dip tank for identification coating and then put onto a rack to air dry.

(b) Natural gas-fired combustion sources with heat input equal or less than ten (10) mmBtu/hr. ~~One (1) natural gas-fired oven in Plant #2, rated at 4.2 million British thermal units (mmBtu) per hour.~~

(1) Two (2) natural gas fired ovens (135L003 and 135L009) located under the Stress relieve and heatset department at plant 1, each rated at 0.53 and 1.0 MMBtu/hr, respectively.

(2) One (1) natural gas-fired oven (135L008) located under Department 135 at plant 1, rated at 0.18 MMBtu/hr.

(3) Three (3) natural gas fired ovens (135L007, 135L005 and 135L001) located under Department 123 at plant 1, each rated at 0.5, 0.8 and 0.53 MMBtu/hr.

(4) Two (2) natural gas fired furnaces (K30 and L20) located under the Heat treat department at plant 2, each rated at 4.2 and 1.2 MMBtu/hr.

(5) Three (3) natural gas fired furnaces located under the Heat treat department at plant 2, each rated at 1.0 MMBtu/hr.

(6) Three (3) natural gas fired bar furnaces (J17, J16, J11) located under the Hot coil department at plant 2, each rated at 2.0, 1.5 and 4.10 MMBtu/hr.

(7) Three (3) natural gas fired draw furnaces located under the Hot coil department, each rated at 2.0, 1.0, and 0.8 MMBtu/hr.

(8) One (1) natural gas fired stress relief oven rated at 0.8 MMBtu/hr and one (1) natural gas fired annealing furnace rated at 0.2 MMBtu/hr, both located at plant 3.

(9) Two (2) natural gas fired furnaces, each rated at 1.2 MMBtu/hr and located

at plant 5.

(c) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(e) Filling drums, pails or other packaging containers with lubricating oils, waxes and greases.

(f) Application of oils, lubricans or other nonvolatile materials applied as temporary protective coatings.

(g) Machining where an aqueous cutting coolant continuously floods the machining interface.

(h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, solding equipment, and welding equipment. [326 IAC 6-3-2]

(i) Groundwater oil recovery wells.

(j) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(k) Quenching operations used with heat treating processes.

(l) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(m) Process vessel degassing and cleaning to prepare for internal repairs.

(n) Paved and unpaved roads and parking lots with public access.

(o) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(p) Blowdown for any of the following: sight glass, boiler, compressors, pump and cooling tower.

(q) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 cubic feet per minute, including the following; deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]

(1) One (1) belt sander, one (1) feeder, two (2) multislides, one (1) small grinder controlled by a dust collector with air flow rate of 900 acfm and venting inside the building (plant #3). [326 IAC 6-3-2]

(2) Tool and dye shop consisting of drill presses, cutting saws, lathes, mill, one (1) blanchard wet grinder (340F027), one (1) wet surface grinder, two surface grinders, one (a) cutoff saw, one (1) dust collector controlling

particulate emissions from the five (5) grinders and one (1) bead blast unit (340H002) with an air flow rate of 900 acfm (plant #3). [326 IAC 6-3-2]

(3) Two (2) shot peen units identified as 550H01 and 550H02, each controlled by one (1) dust collector identified as 550x01 and 550x02, and with the air flow rate of 765 and 935 acfm, respectively (plant #5). [326 IAC 6-3-2]

(4) One (1) wet grinder identified as 125F041 controlled by a dust collector with the flow rate of 100 acfm and exhausting indoors (plant 1 first floor). [326 IAC 6-3-2]

(5) Two (2) grinders identified as 122F11 and 122F04, each controlled by a dust collector with the flow rate of 100 acfm, identified as 122x01 (Department 22). [326 IAC 6-3-2]

(6) One (1) shot peen unit identified as 230H001 and controlled by a dust collector (230x002) with air flow rate of 900 acfm (plant 2 hot coil department). [326 IAC 6-3-2]

(r) Miscellaneous use of VOC containing materials for cleaning, partswashing, quality assurance tests, and rust inhibiting the finished product consuming less than 3 pounds per hour or 15 pounds per day of VOC.
Application of water soluble anti-rust solution identified as WS-72.

(s) The maintenance activities for electric equipment which consumes greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs.

(t) Activities with emissions below insignificant thresholds not previously identified (i.e. VOC emission less than 3 lb/hr and particulate emission less than 5 lb/hr):
Plant 1 (First Floor)
(1) One (1) ink application operation through stamp pad.
(2) One (1) operation identified as mill wright department consisting of one (1) degreaser [326 IAC 8-3-2].
Plant 1 (Basement)
(3) One (1) parts degreasing operation for department 127 [326 IAC 8-3-2].
(4) One (1) parts degreasing operation for department 135 [326 IAC 8-3-2].
(5) One (1) paint operation using dip coating application method.
(6) Two (2) oiling stations.
Plant #2
(7) One (1) maintenance department parts degreasing operation.
Plant #3
(8) One (1) parts degreasing operation [326 IAC 8-3-2].
(9) One (1) GM torque rod line consisting of the following:
(i) One (1) nylon spraying operation controlled by cartridge filter capturing particulates. [326 IAC 6-3-2]
(ii) One (1) paint application operation (F78WX) using dipping application method.

2. The following revisions have been made to the Technical Support Document under the Unrestricted Potential Emissions and Potential to Emit sections (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the

desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. See ATSD Appendix A (pages 1 through 10) for emission calculation revision.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	~~184.75~~ **188.91**
PM-10	~~184.85~~ **189.58**
SO_2	~~negl.~~ **0.07**
VOC	~~91.57~~ **93.76**
CO	~~1.50~~ **9.84**
NO_x	~~1.80~~ **11.71**

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Potential to Emit After Issuance

The source, issued a FESOP on November 4, 1998, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP 017-7074-00022; issued on November 4, 1998.

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Surface Coating (Plants #1 and #2)	0.00	0.00	0.00	89.64	0.00	0.00	9.60 (single) 23.60 (total)
Grinding and Shot Peen (Plant #1)	27.71	27.71	0.00	0.00	0.00	0.00	0.00
Insignificant Activities *	~~negl.~~ **4.16**	~~0.10~~ **4.83**	~~negl.~~ **0.07**	~~1.93~~ **4.12**	~~1.50~~ **9.84**	~~1.80~~ **11.71**	~~negl.~~ **0.21 (single)** **0.23 (total)**
Total PTE After Issuance	~~27.71~~ **31.87**	~~27.71~~ **32.54**	~~negl.~~ **0.07**	~~91.57~~ **93.76**	~~1.50~~ **9.84**	~~1.80~~ **11.71**	< 10 (single) < 25 (total)

* Insignificant activities include natural gas fired combustion unit**s, degreasing operations, powder coating operation, grinding and shot peening operation,** and miscellaneous solvent usage.

3. Section D.2 has also been updated to contain revised description of emission units.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Plant #1:

~~(d) One (1) segment, identified as GP 101, which includes unit ID #'s G19, G18, G20, G01 and P01, for grinding and shot peen of steel springs, with all units controlled by one (1) baghouse, identified as 125X30.~~

~~(e) One (1) segment, identified as GP 102, which includes unit ID #'s G02, G03, G04, G05 and G06, for shot peen of steel springs and grinding the ends, with all units controlled by one (1) baghouse, identified as 125X31.~~

~~(f) One (1) segment, identified as GP 103, which includes unit ID #'s P02, P03, P04, P05 and P10, for grinding and shot peen of steel springs, with all units controlled by one (1) baghouse, identified as 533X05.~~

~~(g) One (1) segment, identified as GP 104, which includes unit ID #'s G07 - G17, G22 - G31, G35 and G36, for grinding and shot peen of steel springs, with all units controlled by one (1) baghouse, identified as 125X32.~~

~~(h) One (1) segment, identified as GP 105 which includes unit ID # P06, for grinding and shot peen of steel springs, controlled by one (1) baghouse, identified as 123H04.~~

(d) One (1) operation identified as grinding tooling department consisting of one (1) small hand grinder controlled by one (1) baghouse identified as 125x030 (GP101).

(e) One (1) operation identified as Department 122 consisting of:
- **(1) Two (2) grinders identified as 125F21 and 125F77, each controlled by a dust collector identified as 125x030 (GP101).**
- **(2) One (1) shot peen unit controlled by a dust collector identified as 533x005 (GP103).**

(f) One (1) operation identified as Department 125 consisting of:
- **(1) Sixteen (16) grinders, with two (2) of the grinders controlled by a dust collector identified as 125x030 (GP101); with four (4) of the grinders controlled by a dust collector identified as 125x031 (GP102); and ten of the grinders controlled by a dust collector identified as 125x032 (GP104).**
- **(2) Two hand grinders**

(g) One (1) operation identified as Department 122 consisting of:
- **(1) One (1) shot peen unit controlled by a dust collector identified as 533x005 (GP103).**
- **(2) Two (2) grinders identified as 125F21 and 125F77, each controlled by a dust collector identified as 125x030 (GP101).**

(h) One (1) operation identified as Department 119 (segment 1) consisting of a shot peen unit identified as 123H004 (GP105) controlled by the dust collector and exhausting inside the building.

(i) One (1) operation identified as shot peening department consisting of four (4) shot peens, each using steel shot and controlled by one (1) baghouse identified as 533x005 (GP103).

SECTION D.2 FACILITY OPERATION CONDITIONS

(j) One (1) operation identified as Department 123 (medium coiling) consisting of one (1) grinder controlled by a dust collector 125x032 (GP104).

(k) One (1) operation identified as Department 127 consisting of the following:
(1) One (1) shot peen unit identified as 127H001 controlled by a dust collector 533x005 (GP103).
(2) Three (3) grinders and one (1) chamfer, each controlled by a dust collector 125x032 (GP104).

Plant #2:

~~(b) One (1) segment, identified as GP 201, which includes unit ID #'s G32 - G34, P07 - P08, and R01 - R03 and G36, for grinding and shot peen of steel springs, with all units controlled by one (1) baghouse, identified as 230X23.~~

~~(c) One (1) segment, identified as GP 202, which includes unit ID # P09, for grinding and shot peen of steel springs, controlled by one (1) baghouse, identified as 230X24.~~

(b) One (1) operation identified as hot coil department consisting of the following:
(1) One (1) shot peen unit identified as 533H011 and controlled by a dust collector 230x024 (GP202).
(2) One (1) shot peen unit identified as 30H12 controlled by a dust collector 230x024 (GP202), and two (2) spring presses.
(3) Two (2) hand grinders controlled by a dust collector identified as 233x023 (GP201).
(4) Two (2) abrasive saws controlled by drum dust collector.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

4. Condition D.2.8 has been revised to update the language to require an emission unit to be automatically shutdown when a broken bag occured that caused visible emissions. The Permittee is required to notify IDEM, OAQ if the broken bag will not be fixed within 10 days.

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. **If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

5. A new D section (D.3) has been inserted in the permit containing all the added insignificant emission units.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Insignificant Activities

(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, solding equipment, and welding equipment. [326 IAC 6-3-2]

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 cubic feet per minute, including the following; deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]

- **(1) One (1) belt sander, one (1) feeder, two (2) multislides, one (1) small grinder controlled by a dust collector with air flow rate of 900 acfm and venting inside the building (plant #3). [326 IAC 6-3-2]**
- **(2) Tool and dye shop consisting of drill presses, cutting saws, lathes, mill, one (1) blanchard wet grinder (340F027), one (1) wet surface grinder, two surface grinders, one (a) cutoff saw, one (1) dust collector controlling particulate emissions from the five (5) grinders and one (1) bead blast unit (340H002) with an air flow rate of 900 acfm (plant #3). [326 IAC 6-3-2]**
- **(3) Two (2) shot peen units identified as 550H01 and 550H02, each controlled by one (1) dust collector identified as 550x01 and 550x02, and with the air flow rate of 765 and 935 acfm, respectively (plant #5). [326 IAC 6-3-2]**
- **(4) One (1) wet grinder identified as 125F041 controlled by a dust collector with the flow rate of 100 acfm and exhausting indoors (plant 1 first floor). [326 IAC 6-3-2]**
- **(5) Two (2) grinders identified as 122F11 and 122F04, each controlled by a dust collector with the flow rate of 100 acfm, identified as 122x01 (Department 22). [326 IAC 6-3-2]**
- **(6) One (1) shot peen unit identified as 230H001 and controlled by a dust collector (230x002) with air flow rate of 900 acfm (plant 2 hot coil department). [326 IAC 6-3-2]**

(c) Activities with emissions below insignificant thresholds not previously identified (i.e. VOC emission less than 3 lb/hr and particulate emission less than 5 lb/hr):

Plant 1 (First Floor)

- **(1) One (1) ink application operation through stamp pad.**
- **(2) One (1) operation identified as mill wright department consisting of one (1) degreaser [326 IAC 8-3-2].**

Plant 1 (Basement)

- **(3) One (1) parts degreasing operation for department 127 [326 IAC 8-3-2].**
- **(4) One (1) parts degreasing operation for department 135 [326 IAC 8-3-2].**
- **(5) One (1) paint operation using dip coating application method.**
- **(6) Two (2) oiling stations.**

Plant #2

- **(7) One (1) maintenance department parts degreasing operation.**

Plant #3

- **(8) One (1) parts degreasing operation [326 IAC 8-3-2].**
- **(9) One (1) GM torque rod line consisting of the following:**
  - **(i) One (1) nylon spraying operation controlled by cartridge filter capturing particulates. [326 IAC 6-3-2]**
  - **(ii) One (1) paint application operation (F78WX) using dipping application method. application method.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

6. IDEM, OAQ has determined that the degreasing operations at this source are subject to the

requirements of 326 IAC 8-3-2. This rule applies to new facilities after January 1, 1980, performing organic solvent degreasing operations located anywhere in the state. Total of five (5) degreasing operations at this source, each constructed after the rule applicability date of January 1, 1980, are subject to 326 IAC 8-3-2.

Additionally, it has been determined that this source is not subject to the requirements of rule 326 IAC 8-3-5. The requirements of this rule apply to cold cleaning degreasers without remote solvent reservoir that either existed as of July 1, 1990 and was located in a specified county, or the cleaning facility was constructed after July 1, 1990 and was located in anywhere in the state. This source, located in Cass County which is a non-listed county, is not subject to the applicable rule requirements since all the degreasers were constructed before the rule applicability date of July 1, 1990, therefore these units are not subject to 326 IAC 8-3-5 requirements.

Condition D.3.1 has been added containing the requirements of rule 326 IAC 8-3-2.

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

7. Above listed insignificant activities with particulate emissions are determined to be subject to the requirements of rule 326 IAC 6-3-2(c). Condition D.3.2 has been added containing the requirements of this rule.

D.3.2 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

8. Condition B.10 (Compliance with Permit Conditions) has been removed from the B section and has been added to the FESOP title page instead.

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

Matthew-Warren Incorporated
Plants #1 and #3 - 500 E. Ottawa St., Logansport, IN 46974
Plant #2 - 300 E. Miami Ave., Logansport, IN 46974
Plant #5 - 801 Bates Street, Logansport, IN 46947

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

~~B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]~~

~~(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:~~

~~(1) Enforcement action;~~

~~(2) Permit termination, revocation and reissuance, or modification; or~~

~~(3) Denial of a permit renewal application.~~

~~(b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.~~

~~(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.~~

~~(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.~~

All the remaining conditions in section B have been re-numbered accordingly.

9. The notification requirement under condition C.16(b)(3) has been modified to apply only to situations where the emission unit will continue to operate for an extended time while the compliance monitoring parameter is out of range. It is intended to provide the OAQ an opportunity to assess the situation and determine whether any additional actions are necessary to demonstrate compliance with applicable requirements.

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(3) ~~If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.~~ **If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.**

10. Conditions C.10, C.15 and C.19 have been updated to change “source” to “Permittee”.

C.10 Performance Testing [326 IAC 3-6]

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the ~~source~~ **Permittee** submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance as defined in is present at a source in more than a threshold quantity, the ~~source~~ **Permittee** must comply with the applicable requirements of 40 CFR 68.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The ~~source~~ **Permittee** shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The

Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	Matthew - Warren Incorporated
Source Location:	Plants #1 and #3 - 500 E. Ottawa St., Logansport, IN 46974 Plant #2 - 300 E. Miami Ave., Logansport, IN 46974
County:	Cass
SIC Code:	3495
Operation Permit No.:	F017-16766-00022
Permit Reviewer:	Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Matthew - Warren Incorporated relating to the operation of a steel springs manufacturing source. Matthew - Warren Incorporated was issued FESOP 017-7074-00022 on November 4, 1998.

Source Definition

This steel springs manufacturing company consists of three (3) plants:

(1) Plant #1 is located at 500 E. Ottawa St., Logansport, IN 46947;

(2) Plant 2 is located at 300 E. Miami Ave., Logansport, IN 46947; and

(3) Plant #3 is located at 500 E. Ottawa St., Logansport, IN 46947.

Since the three (3) plants are located on adjacent properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

Plant #1:

(a) One (1) segment, identified as SCP101, for applying paints and inks to steel springs and miscellaneous metal parts through dipping, brushing and rollcoating, and exhausting through three (3) stacks (ID #'s S101A, S101C and S101D).

(b) One (1) segment, identified as SCP102, for marking steel springs with a rollcoater or stamper, and exhausting through two (2) stacks (ID #'s S102A and S102B).

(c) One (1) segment, identified as SCP103, for applying paints and inks to steel springs and

miscellaneous metal parts through dipping, brushing and rollcoating, and exhausting through two (2) stacks (ID #'s S103A and S103B).

(d) One (1) segment, identified as GP 101, which includes unit ID #'s G19, G18, G20, G01 and P01, for grinding and shot peen of steel springs, with all units controlled by one (1) baghouse, identified as 125X30.

(e) One (1) segment, identified as GP 102, which includes unit ID #'s G02, G03, G04, G05 and G06, for shot peen of steel springs and grinding the ends, with all units controlled by one (1) baghouse, identified as 125X31.

(f) One (1) segment, identified as GP 103, which includes unit ID #'s P02, P03, P04, P05 and P10, for grinding and shot peen of steel springs, with all units controlled by one (1) baghouse, identified as 533X05.

(g) One (1) segment, identified as GP 104, which includes unit ID #'s G07 - G17, G22 - G31, G35 and G36, for grinding and shot peen of steel springs, with all units controlled by one (1) baghouse, identified as 125X32.

(h) One (1) segment, identified as GP 105 which includes unit ID # P06, for grinding and shot peen of steel springs, controlled by one (1) baghouse, identified as 123H04.

Plant #2:

(a) One (1) segment, identified as SCP201, for applying water based paints by dipping steel springs in a dip tank and then putting onto a conveyorized rack for drying.

(b) One (1) segment, identified as GP 201, which includes unit ID #'s G32 - G34, P07 - P08, and R01 - R03 and G36, for grinding and shot peen of steel springs, with all units controlled by one (1) baghouse, identified as 230X23.

(c) One (1) segment, identified as GP 202, which includes unit ID # P09, for grinding and shot peen of steel springs, controlled by one (1) baghouse, identified as 230X24.

Plant #3:

There are no activities qualified as significant at the plant.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) One (1) segment in Plant #3, identified as SCP301, where steel T-bar ends are dipped into a small dip tank for identification coating and then put onto a rack to air dry.

(b) Natural gas-fired combustion sources with heat input equal or less than ten (10) mmBtu/hr.

One (1) natural gas-fired oven in Plant #2, rated at 4.2 million British thermal units (mmBtu) per hour.

(c) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(d) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(e) Filling drums, pails or other packaging containers with lubricating oils, waxes and greases.

(f) Application of oils, lubricans or other nonvolatile materials applied as temporary protective coatings.

(g) Machining where an aqueous cutting coolant continuously floods the machining interface.

(h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, solding equipment, and welding equipment. [326 IAC 6-3-2]

(i) Groundwater oil recovery wells.

(j) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(k) Quenching operations used with heat treating processes.

(l) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(m) Process vessel degassing and cleaning to prepare for internal repairs.

(n) Paved and unpaved roads and parking lots with public access.

(o) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(p) Blowdown for any of the following: sight glass, boiler, compressors, pump and cooling tower.

(q) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 cubic feet per minute, including the following; deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]

(r) Miscellaneous use of VOC containing materials for cleaning, partswashing, quality assurance tests, and rust inhibiting the finished product consuming less than 3 pounds per

hour or 15 pounds per day of VOC.

(s) The maintenance activities for electric equipment which consumes greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs.

Existing Approvals

The source has been operating under the following previous approvals:

(a) FESOP 017-7074-00022, issued on November 4, 1998.

(b) First Permit Reopening 017-13017-00022, issued on October 1, 2001.

All terms and conditions of previous permit issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on February 3, 2003.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 6).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	184.75

PM-10	184.85
SO_2	negl.
VOC	91.57
CO	1.50
NO_x	1.80

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
Toluene	greater than 10
Xylene	greater than 10
Glycol Ethers	greater than 10
Triethylamine	less than 10
MEK	less than 10
Lead	less than 10
Ethylbenzene	less than 10
Formaldehyde	less than 10
Hexane	negl.
TOTAL	greater than 25

(a) The unrestricted potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10 is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on November 4, 1998, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission

units included in the original FESOP 017-7074-00022; issued on November 4, 1998.

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Surface Coating (Plants #1 and #2)	0.00	0.00	0.00	89.64	0.00	0.00	9.60 (single) 23.60 (total)
Grinding and Shot Peen (Plant #1)	27.71	27.71	0.00	0.00	0.00	0.00	0.00
Insignificant Activities *	negl.	0.10	negl.	1.93	1.50	1.80	negl.
Total PTE After Issuance	27.71	27.71	negl.	91.57	1.50	1.80	< 10 (single) < 25 (total)

* Insignificant activities include natural gas fired combustion unit and miscellaneous solvent usage.

County Attainment Status

The source is located in Cass County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Cass County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

There are no new federal rules applicable to the source during this FESOP review process. The applicability determination that follows is based on that conducted for original FESOP F017-7074-00022, issued on November 4, 1998.

(a) The source is not subject to the requirements of New Source Performance Standards, 326 IAC 12, (40 CFR Part 60.460, Subpart TT (Standards of Performance for Metal Coil Surface Coating)), because the source was constructed in 1930 before the rule applicability date of January 5, 1981.

(b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63.5080, Subpart SSSS (Surface Coating of Metal Coils)), because the source is not a major source of HAP. The source has chosen to limit the source wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively, by limiting the annual coating usage.

(c) The source is not subject to Compliance Assurance Monitoring (CAM), 40 CFR Part 64. This rule applies to pollutant-specific emissions unit at a major source that is required to obtain a Part 70 permit. This is a FESOP source therefore, this rule does not apply.

(d) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source, because the source has potential to emit of less than 10 tons per year of a single HAP and less than 25 tons per year of the combination of HAPs.

State Rule Applicability - Entire Source

There are no new state rules applicable to this source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for original FESOP 017-7074-00022, issued on November 4, 1998.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source is not subject to the requirements of this rule. This source was constructed in 1938, prior to the rule applicability date of August 7, 1977, is not one of the 28 listed source categories and no major modifications were done, therefore, it is not subject to the requirements of the rule. Therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

326 IAC 2-4.1-1 (New Source Toxics Control)

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control) because no new or reconstructed facilities with a PTE of any single HAP at 10 tons per year or 25 tons per year of the combination HAPs have been installed since July 27, 1997. Therefore, 326 IAC 2-4.1-1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Cass County which is not one of the specifically listed counties, nor does this FESOP source have the potential to emit CO, VOC, NO_X, PM10 (including fugitive emissions), or SO_2 in amounts at or exceeding one-hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-6 do not apply to the source.

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the following condition shall apply:

(a) The total input usage of any single HAP, and total HAPs delivered to the applicators in the surface coating operations (identified as SCP101, SCP102, SCP103, SCP201, and SCP301) and during clean-up shall be limited to less than 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

(b) PM-10 emissions from the following facilities shall be limited as follows:

Facilities	Limited PM10 Emissions (lb/hr)	Limited PM10 Emissions (tons/hr)
GP 101	0.66	2.89
GP 102	0.66	2.89
GP 103	0.66	2.89
GP 104	3.03	13.28
GP 105	0.13	0.58
GP 201	1.05	4.62
GP 202	0.13	0.58

Compliance with above conditions will limit the source-wide PM10, single HAP, and total HAPs emissions to less than 100, 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of 326 IAC 2-7 (Part 70) do not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15)

minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

State Rule Applicability - Individual Facilities

There are no new state rules determined as applicable to individual facilities at this source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for original FESOP 017-7074-00022, issued on November 4, 1998.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 the particulate emissions from the grinding and shot peen operations shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Facilities	Process Weight Rate (tons/hr)	Particulate Allowable Emissions (lb/hr)	Compliance Calculations (lb/hr)
GP 101	0.273	1.72	0.66
GP 102	0.273	1.72	0.66
GP 103	0.273	1.72	0.66
GP 104	1.255	4.77	3.03
GP 105	0.054	0.58	0.13
GP 201	0.436	2.35	1.05
GP 202	0.054	0.58	0.13

These facilities are in compliance with these particulate allowable emissions, since their emissions after control are less than the particulate allowable emissions.

The baghouses shall be in operation at all times the grinding and shot peen equipment are in operation, in order to comply with this limit.

326 IAC 6-3-2 (Process Operations)

The metal coating operations are not subject to 326 IAC 6-3-2 (Process Operations). This rule establishes emissions limitations for particulate emissions from process operations located anywhere in the state. The metal coating operation uses roll coating applicators (which are assumed to have 100% transfer efficiency), therefore, there are no particulate matter emissions from this operation.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and are not otherwise regulated by other provisions of Article 8. The surface coating operations at this source (identified as SCP101, SCP102, SCP103, SCP201, and SCP301) with greater than 25 tons per year of VOC emissions, were originally constructed in 1930's, and no new emission units with VOC emission greater than 25 tons per year have been installed after the rule applicability date of January 1, 1980. Therefore, rule 326 IAC 8-1-6 does not apply to this source.

326 IAC 8-2-4 (Coil Coating Operations)

This rule applies to facilities, existing as of January 1, 1980, with potential emissions of greater than 100 tons per year of VOC located in Clark, Floyd, St. Joseph, Elkhart, Lake, Porter, or Marion counties. The coil coating operations at this source (identified as SCP101, SCP102, SCP103, SCP201, and SCP301) are not subject to the requirements of 326 IAC 8-2-4 (Coil Coating Operations) because the source constructed in 1930's is not located in any of the listed counties and the potential VOC emissions are less than 100 tons per year.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

This rule applies to facilities, existing as of November 1, 1980, with potential emissions of greater than 100 tons per year of VOC located in Clark, Floyd, St. Joseph, Elkhart, Lake, Porter, or Marion counties. The metal coating operations at this source (identified as SCP101, SCP102, SCP103, SCP201, and SCP301) are not subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) because the source constructed in 1930's is not located in any of the listed counties and the potential VOC emissions are less than 100 tons per year.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties, as well as to facilities commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source is located in Cass County and potential VOC emissions are less than 100 tons per year. Therefore, this rule does not apply to this source.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake. Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Cass County. Therefore, this rule is not applicable to this source.

Testing Requirements

Compliance testing is not required of this source since the coating material usage and related VOC and volatile organic HAP emissions assume an emission factor of 2,000 pounds of pollutant emitted per ton of pollutant input to the coating operation, and the grinding and shot peen operations are controlled by baghouse with emissions after control well below the allowable particulate matter emission rate.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP except the frequency of performing visible emission notations and recording of pressure drop readings has been changed from daily to once per shift.

Reason changed: Compliance monitoring conditions are in the permit in order to ensure continuous compliance with the requirements. Baghouse failure can occur suddenly; therefore monitoring of baghouse operational parameters should be more frequently than weekly or even daily in such cases where a source operates more than one shift per day. The OAQ believes that changing visible emissions notations to once per operating shift is a reasonable requirement. Therefore, the requirements to perform visible emissions notations have been changed from weekly to once per shift. This change likewise applies to the pressure drop readings.

1. The grinding and shot peen operations (GP 101, GP 102, GP 103, GP 104, GP 105, GP 201, and GP 202) have applicable compliance monitoring conditions as specified below:

   (a) Once per shift visible emissions notations of the grinding and shot peen operations (GP 101, GP 102, GP 103, GP 104, GP 105, GP 201, and GP 202) stacks exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be

expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(b) The Permittee shall record the total static pressure drop across the baghouses controlling the grinding and shot peen operations (GP 101, GP 102, GP 103, GP 104, GP 105, GP 201, and GP 202), at least once per shift when the units are in operation. When for any one reading, the pressure drop across the baghouses 125X30, 125X31, 533X05, 125X32, 123H04, 230X23, and 230X24 is outside the normal ranges of 1.0 and 1.5, 1.2 and 1.7, 0.8 and 1.3, 1.8 and 2.6, 2.5 and 4, 0.6 and 1.1, and 0.8 and 1.3 inches of water, respectively or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan-Failure to Take Response Steps - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) An inspection shall be performed each calendar quarter of all bags controlling the process. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

(d) In the event that bag failure has been observed:

(1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(2) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the

event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouses for grinding and shot peen operations (GP 101, GP 102, GP 103, GP 104, GP 105, GP 201, and GP 202) must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this steel springs manufacturing source shall be subject to the conditions of the attached proposed FESOP No.: F017-16766-00022.

Appendix A: Emission Calculations

Company Name: Matthew-Warren Incorporated
Address City IN Zip: 500 E. Ottawa Street, Logansport, IN 46947
FESOP Renewal No.: 017-16766-00022
Reviewer: Adeel Yousuf/EVP
Date: July 1, 2003

Total Potential To Emit (tons/year)

	Emissions Generating Activity				
Pollutant	Surface Coating	Grinding and Shot Peen	Insignificant Activities Misc. Solvent Usage and Degreasing	Insignificant Activities *	**TOTAL**
PM	0.00	184.75	0.00	4.16	188.91
PM10	0.00	184.75	0.00	4.83	189.58
SO2	0.00	0.00	0.00	0.07	0.07
NOx	0.00	0.00	0.00	11.71	11.71
VOC	89.64	0.00	3.48	0.64	93.76
CO	0.00	0.00	0.00	9.84	9.84
total HAPs	74.67	0.00	negl.	0.23	74.90
worst case single HAP	63.80 (Toluene)	0.00	negl.	0.218 (Hexane)	63.80 (Toluene)

Total emissions based on rated capacities at 8,760 hours/year.

Limited Potential To Emit (tons/year)

	Emissions Generating Activity				
Pollutant	Surface Coating	Grinding and Shot Peen	Insignificant Activities Misc. Solvent Usage and Degreasing	Insignificant Activities *	**TOTAL**
PM	0.00	27.71	0.00	4.16	31.87
PM10	0.00	27.71	0.00	4.83	32.54
SO2	0.00	0.00	0.00	0.07	0.07
NOx	0.00	0.00	0.00	11.71	11.71
VOC	89.64	0.00	3.48	0.64	93.76
CO	0.00	0.00	0.00	9.84	9.84
total HAPs	< 25	0.00	negl.	0.23	< 25
worst case single HAP	(Toluene) < 10	0.00	negl.	0.218 (Hexane)	(Toluene) < 10

Total emissions based on rated capacities at 8,760 hours/year.

Single HAP and total HAPs emissions are limited to less than 10 and 25 tons per year, respectively, to satisfy the requirements of 326 IAC 2-8-4.

** Insignificant activities include natural gas fired combustion units, degreasing operations, powder coating operation, grinding and shot peening operation, and miscellaneous solvent usage.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Matthew-Warren Incorporated
Address City IN Zip: 500 E. Ottawa Street, Logansport, IN 46947
FESOP Renewal No.: 017-16766-00022
Reviewer: Adeel Yousuf/EVP
Date: July 1, 2003

Material	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
SCP101, SCP102 and SCP103																
LX7002	7.99	65.10%	0.0%	65.1%	0.0%	34.33%	0.01600	60	5.20	5.20	4.99	119.84	21.87	0.00	15.15	100%
LX6985	8.23	61.60%	0.0%	61.6%	0.0%	37.50%	0.01600	60	5.07	5.07	4.87	116.81	21.32	0.00	13.52	100%
LX6662	8.21	55.90%	0.0%	55.9%	0.0%	43.08%	0.00200	830	4.59	4.59	7.62	182.84	33.37	0.00	10.65	100%
LX5113	7.58	61.40%	0.0%	61.4%	0.0%	38.25%	0.00040	150	4.65	4.65	0.28	6.70	1.22	0.00	12.17	100%
Lx4898	7.42	66.90%	0.0%	66.9%	0.0%	33.00%	0.00037	360	4.96	4.96	0.66	15.87	2.90	0.00	15.04	100%
EA-L3054	8.29	76.20%	0.0%	76.2%	0.0%	15.01%	0.00033	2500	6.32	6.32	5.21	125.08	22.83	0.00	42.09	100%
B50Y1	8.79	60.50%	0.0%	60.5%	0.0%	23.70%	0.05000	66	5.32	5.32	17.55	421.18	76.87	0.00	22.44	100%
DMF Blue	7.16	85.20%	0.0%	85.2%	0.0%	15.30%	0.00480	208	6.10	6.10	6.09	146.17	26.68	0.00	39.87	100%
DXX553	7.08	88.10%	0.0%	88.1%	0.0%	11.90%	0.00480	208	6.24	6.24	6.23	149.46	27.28	0.00	52.42	100%
SUBTOTAL											**17.55**	**421.18**	**76.87**	**0.00**		
SCP201																
F78WXA4349	9.28	65.50%	50.5%	15.0%	56.3%	31.60%	0.016	120	3.19	1.39	2.67	64.14	11.71	0.00	4.41	100%
F78WXR4345	8.46	74.10%	58.1%	16.0%	59.0%	30.20%	0.016	120	3.30	1.35	2.60	62.37	11.38	0.00	4.48	100%
F78W508	9.22	67.30%	52.4%	14.9%	58.0%	31.30%	0.016	120	3.27	1.37	2.64	63.30	11.55	0.00	4.39	100%
F78B501	8.41	75.00%	59.2%	15.8%	59.8%	29.70%	0.016	120	3.31	1.33	2.55	61.23	11.17	0.00	4.47	100%
F78L519	8.44	74.70%	59.1%	15.6%	59.9%	29.50%	0.016	120	3.28	1.32	2.53	60.67	11.07	0.00	4.46	100%
SUBTOTAL											**2.67**	**64.14**	**11.71**	**0.00**		
SCP301																
LX4897	7.71	62.80%	0.0%	62.8%	0.0%	36.75%	0.00007	700	4.84	4.84	0.24	5.69	1.04	0.00	13.18	100%
LX4896	7.81	63.50%	0.0%	63.5%	0.0%	35.92%	0.00007	700	4.96	4.96	0.24	5.83	1.06	0.00	13.81	100%
SUBTOTAL											**0.24**	**5.83**	**1.06**	**0.00**		
Potential Emissions											**20.46**	**491.16**	**89.64**	**0.00**		

METHODOLOGY

Coating usages in each area are mutually exclusive.
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
SCP301 is an insignificant activity, because the segment has a potential VOC emissions of less than 3 lbs/hr and 15 lbs/day.

Appendix A: Emissions Calculations
HAPs Emissions
Company Name: Matthew-Warren Incorporated
Address City IN Zip: 500 E. Ottawa Street, Logansport, IN 46947
FESOP Renewal No.: 017-16766-00022
Reviewer: Adeel Yousuf/EVP
Date: July 1, 2003

Coating or Solvent	Consumption per unit	Maximum per hour	Annual Usage	Coating or Solvent Density	Annual Wt. of coating or solvent used	Toxic A Xylene	Toxic B Toluene	Toxic C MEK	Toxic D Lead	Toxic E Formal-dehyde	Toxic F Ethyl-benzene	Toxic G Glycol Ethers	Toxic H Triethyl-amine	Toxic I Cobalt Compound	Toxic J Chromium Compound	All Toxics
	gal/unit	unit/hr	gal/yr	lb/gal	lb/yr	Wt. %	Wt. %	Wt. %	Wt. %	Wt. %	Wt. %	Wt. %	Wt. %	Wt. %	Wt. %	
						tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr
SCP101, SCP102 and SCP103																
LX7002	0.01600	60	8409.60	7.99	67,193	40.83%	8.33%	0.00%	0.00%	0.12%	0.00%	0.00%	0.00%	0.00%	0.00%	
						13.7185	2.7997	0.0000	0.0000	0.0403	0.0000	0.0000	0.0000	0.0000	0.0000	16.558
LX6985	0.01600	60	8409.60	8.23	69,211	37.50%	16.67%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	
						12.9771	5.7677	0.0000	0.0000	0.0058	0.0000	0.0000	0.0000	0.0000	0.0000	18.751
LX6662	0.00200	830	14541.60	8.21	119,387	19.17%	16.67%	0.00%	0.00%	0.00%	0.83%	4.17%	0.00%	0.00%	0.00%	
						11.4412	9.9491	0.0000	0.0000	0.0000	0.4974	2.4872	0.0000	0.0000	0.0000	24.375
LX5113	0.00040	150	525.60	7.58	3,984	10.00%	25.00%	0.00%	0.00%	0.00%	0.00%	4.17%	0.00%	0.10%	0.10%	
						0.1992	0.4980	0.0000	0.0000	0.0000	0.0000	0.0830	0.0000	0.0020	0.0020	0.784
LX4898	0.00037	360	1166.83	7.42	8,658	2.50%	16.67%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
						0.1082	0.7215	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.830
EA-L3054	0.00033	2500	7227.00	8.29	59,912	22.26%	50.00%	0.00%	3.48%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
						6.6682	14.9780	0.0000	1.0425	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	22.689
B50Y1	0.05000	66	28908.00	8.79	254,101	1.10%	50.00%	0.00%	0.00%	0.00%	0.20%	0.00%	0.00%	0.00%	0.00%	
						1.3976	63.5253	0.0000	0.0000	0.0000	0.2541	0.0000	0.0000	0.0000	0.0000	65.177
DMF bLUE	0.00480	208	8745.98	7.16	62,621	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
						0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.000
DXX553	0.00480	208	8745.98	7.08	61,922	0.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
						0.0000	3.0961	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	3.096
MEK				6.75	2,254	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
						0.0000	0.0000	1.1270	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	1.127
SCP201																
F78WXA4349	0.01600	120	16819.20	9.28	156,082	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	10.00%	1.67%	0.00%	0.00%	
						0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	7.8041	1.3007	0.0000	0.0000	9.105
F78WXR4345	0.01600	120	16819.20	8.46	142,290	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.00%	1.67%	0.00%	0.00%	
						0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	7.8260	1.1858	0.0000	0.0000	9.012
F78W508	0.01600	120	16819.20	9.22	155,073	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	10.00%	1.67%	0.00%	0.00%	
						0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	7.7537	1.2923	0.0000	0.0000	9.046
F78B501	0.01600	120	16819.20	8.41	141,449	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	10.00%	1.67%	0.00%	0.00%	
						0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	7.0725	1.1788	0.0000	0.0000	8.251
F78L519	0.01600	120	16819.20	8.44	141,954	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	10.00%	1.67%	0.00%	0.00%	
						0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	7.0977	1.1830	0.0000	0.0000	8.281
SCP301																
LX4897	0.00007	700	429.24	7.71	3,309	2.50%	16.67%	0.00%	0.00%	0.00%	0.00%	4.17%	0.00%	0.00%	0.00%	
						0.0414	0.2758	0.0000	0.0000	0.0000	0.0000	0.0689	0.0000	0.0000	0.0000	0.386
LX4896	0.00007	700	429.24	7.81	3,352	0.00%	16.67%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
						0.0000	0.2794	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.279
Potential Air Toxics Emissions (tons/yr)						**13.76**	**63.80**	**1.13**	**1.04**	**0.04**	**0.50**	**10.38**	**1.30**	**0.00**	**0.00**	**74.67**

Total HAP emissions for the source are limited to 24.0 tons/year and single HAP emissions are limited to 9.0 tons/year. Therefore, the requirements of 326 IAC 2-7 do not apply.

METHODOLOGY

All coatings reflect "as applied" by the applicator.
Annual Usage (ton/yr) = Usage rate (gal/hr) * 8,760 (hrs/yr) * Density (lb/gal) / 2000 (lb/ton)
Air Toxic Tons per Year = Annual Usage (tons/yr) * Weight % Air Toxic

Appendix A: Emissions Calculations
Grinding and Shot Peen Operations

Company Name: Matthew-Warren Incorporated
Address City IN Zip: 500 E. Ottawa Street, Logansport, IN 46947
FESOP Renewal No.: 017-16766-00022
Reviewer: Adeel Yousuf/EVP
Date: July 1, 2003

Segment ID #	Amount of Dust Collected (lbs)	# of Hours Baghouse in Operation	Control Efficiency (%)	Uncontrolled Emissions		Controlled Emissions		Process Wt. Rate (lb/hr)	326 IAC 6-3 Limit (lb/hr)	Compliance (Y/N)
				(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)			
125X030 (GP101)	15,537	4,160	85.0%	4.39	19.25	0.66	2.89	546	1.72	Y
125X031 (GP102)	15,537	4,160	85.0%	4.39	19.25	0.66	2.89	546	1.72	Y
533X005 (GP103)	15,537	4,160	85.0%	4.39	19.25	0.66	2.89	546	1.72	Y
125X032 (GP104)	71,469	4,160	85.0%	20.21	88.53	3.03	13.28	2,510	4.77	Y
123H004 (GP105)	3,107	4,160	85.0%	0.88	3.85	0.13	0.58	109	0.58	Y
230X023 (GP201)	24,859	4,160	85.0%	7.03	30.79	1.05	4.62	873	2.35	Y
230XGP 202	3,107	4,160	85.0%	0.88	3.85	0.13	0.58	109	0.58	Y
			Total	**42.18**	**184.75**	**6.33**	**27.71**			

Note: 326 IAC 6-3 allowable PM emissions are calculated with the following equation:

$E = 4.1 P^{0.67}$ where: E is the allowable emissions in lb/hr.
P is the process weight rate in tons/hr.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Matthew-Warren Incorporated
Address City IN Zip: 500 E. Ottawa Street, Logansport, IN 46947
FESOP Renewal No.: 017-16766-00022
Reviewer: Adeel Yousuf/EVP
Date: November 1, 2003

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
26.7	234.2

Facilities	**MMBtu/hr**
Plant 1 ovens and furnaces (Insignificant)	3.54
Plant 2 ovens and furnaces (Insignificant)	19.8
Plant 3 ovens and furnaces (Insignificant)	1
Plant 4 ovens and furnaces (Insignificant)	2.4
Total	**26.74**

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.22	0.89	0.07	11.71	0.64	9.84

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM Btu/hr 0.3 - < 100

HAPs Emissions

Company Name: Matthew-Warren Incorporated
Address City IN Zip: 500 E. Ottawa Street, Logansport, IN 46947
FESOP Renewal No.: 017-16766-00022
Reviewer: Adeel Yousuf/EVP
Date: November 1, 2003

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.460E-04	1.405E-04	8.784E-03	2.108E-01	3.982E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	5.856E-05	1.288E-04	1.640E-04	4.451E-05	2.460E-04

Methodology is the same as page 5.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
VOC
From Degreasing Operation

Company Name: Matthew-Warren Incorporated
Address City IN Zip: 500 E. Ottawa Street, Logansport, IN 46947
FESOP Renewal No.: 017-16766-00022
Reviewer: Adeel Yousuf/EVP
Date: November 1, 2003

Insignificant Activity: Degreaser

Potential Emissions:

Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/day)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
Crystal Clean Solvent	Millwright Department Solvent Degreaser	6.54	100.00%	0.00%	100.00%	0.00%	0.00%	0.500	0.14	3.27	0.60
Crystal Clean Solvent	Department 127 Parts Degreaser	6.54	100.00%	0.00%	100.00%	0.00%	0.00%	0.500	0.14	3.27	0.60
Crystal Clean Solvent	Department 135 Parts Degreaser	6.54	100.00%	0.00%	100.00%	0.00%	0.00%	0.500	0.14	3.27	0.60
Crystal Clean Solvent	Maintenance Department Degreaser	6.54	100.00%	0.00%	100.00%	0.00%	0.00%	0.500	0.14	3.27	0.60
Crystal Clean Solvent	Plant 3 Parts Degreaser	6.54	100.00%	0.00%	100.00%	0.00%	0.00%	0.500	0.14	3.27	0.60
Total Potential Emissions:									**0.68**	**16.35**	**2.98**

Note: Crystal Clean degreasing solvent does not contain any HAPs.

Methodology:
Potential VOC Pounds per Hour = Density (lb/gal) * Gal of Material (gal/day) / 24 hrs/day
Potential VOC Pounds per Day = Density (lb/gal) * Gal of Material (gal/day)
Potential VOC Tons per Year = Density (lb/gal) * Gal of Material (gal/day) * (365 days/yr) * (1 ton/2000 lbs)

Appendix A: Emissions Calculations
Particulater Matter (PM) Emissions

Company Name: Matthew-Warren Incorporated
Address City IN Zip: 500 E. Ottawa Street, Logansport, IN 46947
FESOP Renewal No.: 017-16766-00022
Reviewer: Adeel Yousuf/EVP
Date: December 15, 2003

Insignificant Activities

Particulate Matter Emissions from wet grinder (125F041) (Plant 1 first floor)

PM/PM10:	0.03	gr/acf outlet x	100	acf/min x	60	min/hr /	7000	gr/lb x	4.38 ton/yr / lb/hr /	0.01	**0.11 tons/yr (controlled)**
	where the baghouse control efficiency is listed at		99.00%								

Particulate Matter Emissions from two grinders (122F11 and 122F04) (Plant 1 Department 22)

PM/PM10:	0.03	gr/acf outlet x	100	acf/min x	60	min/hr /	7000	gr/lb x	4.38 ton/yr / lb/hr /	0.01	**0.11 tons/yr (controlled)**
	where the baghouse control efficiency is listed at		99.90%								

Particulate Matter Emissions from shot peen unit (230H001) (Plant 2 Hot coil department)

PM/PM10:	0.03	gr/acf outlet x	900	acf/min x	60	min/hr /	7000	gr/lb x	4.38 ton/yr / lb/hr /	0.01	**1.01 tons/yr (controlled)**
	where the baghouse control efficiency is listed at		99.90%								

Particulate Matter Emissions from shot peen unit (550H01) (Plant 5)

PM/PM10:	0.03	gr/acf outlet x	765	acf/min x	60	min/hr /	7000	gr/lb x	4.38 ton/yr / lb/hr /	0.01	**0.86 tons/yr (controlled)**
	where the baghouse control efficiency is listed at		99.90%								

Particulate Matter Emissions from shot peen unit (550H02) (Plant 5)

PM/PM10:	0.03	gr/acf outlet x	935	acf/min x	60	min/hr /	7000	gr/lb x	4.38 ton/yr / lb/hr /	0.01	**1.05 tons/yr (controlled)**
	where the baghouse control efficiency is listed at		99.90%								

Total: 3.15 tons/yr (controlled)

Methodology:
Uncontrolled PM/PM10 = grain loading (gr/acf outlet) * Flow rate (acfm) * (60 min/hr) * (1 lb/7000 gr) * 4.38 (tons/yr / lb/hr) / (1- control effeciency %)

Appendix A: Emissions Calculations

Powder Coating Operations

Company Name: Matthew-Warren Incorporated
Address City IN Zip: 500 E. Ottawa Street, Logansport, IN 46947
FESOP Renewal No.: 017-16766-00022
Reviewer: Adeel Yousuf/EVP
Date: December 15, 2003

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Pounds of Powder used (lb/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency *
Nylon Powder	n/a	0.00%	0.0%	0.0%	0.0%	100.00%	0.18000	0.00	0.00	0.00	0.00	0.00	0.788	0.00	0%
								Potential Emissions		**0.00**	**0.00**	**0.00**	**0.79**		
Controlled Potential Emissions															

Control Efficiency PM	Controlled PM tons/yr
99.70%	**0.002**

* Transfer Efficiency is assumed to be 0% for worst case emissions.

Total Controlled Potential Emissions:

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (lb/unit) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
Miscellaneous Solvent and Ink Usage

Company Name: **Matthew-Warren Incorporated**
Address City IN Zip: **500 E. Ottawa Street, Logansport, IN 46947**
FESOP Renewal No.: **017-16766-00022**
Reviewer: **Adeel Yousuf/EVP**
Date: **December 15, 2003**

Solvents and Ink Usage (Insignificant Acitivity)

VOC Emissions

Operation	Chemical	Maximum Usage (lb/hr)	Percent VOC Evaporated (%)	Potential emissions (TPY)
Departement 119, Segment 1 Ink application	Carco F-123	0.11	100.00%	0.482
Department 135, Section P Paint usage	Staining Purple DKG	6.85E-04	100.00%	0.003
Department 135, Section P Paint usage	Staining Red DNC	9.13E-04	100.00%	0.004
Department 135, Section P Paint usage	Staining White DW	6.85E-04	100.00%	0.003
Department 135, Section P Paint usage	Caterpilar Yellow A.D. Dip & Spin Davis Frost	2.85E-03	100.00%	0.012
			Total VOC	**0.504**

Notes:
Transfer efficiency is 100%, therefore there are no particulates emitted.